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9 | Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16
17 vs.
18 JASON EDWARD THOMAS
19 CARDIFF,
Defendant.

Case No. 5:23-cr-00021-JGB

JASON CARDIFF'S EX PARTE APPLICATION FOR AN ORDER EXTENDING INTERNATIONAL TRAVEL AND RETURNING HIS PASSPORT

*[Filed concurrently with Declaration of
Stephen R. Cochell and [Proposed]
Order]*

1 **EX PARTE APPLICATION**

2 Jason Cardiff has requested that counsel file this *ex parte* application
3 extending his travel to Ireland from on or about December 20, 2024 for a period of
4 thirty additional nights returning on or about January 19, 2024. The reason for the
5 request is the need for continued medical testing and treatment in Ireland, as set
6 forth below.

7 **Background**

8 Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the
9 amount of \$500,000 with full deeding of real property. His release conditions
10 include, among other conditions: a travel restriction to the Central District of
11 California and the Southern District of Texas; a curfew between the hours of 8:00
12 p.m. and 8:00 a.m.; and placement in the custody of third-party custodian, Attorney
13 Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties
14 in support of the bond. Ms. Murphy also deeded her home as collateral.

15 Mr. Cardiff is living with Attorney Cochell in Kingwood, Texas, and he is
16 being supervised by United States Probation Officer Jack Sherrod of the Southern
17 District of Texas.

18 The Court granted permission to travel to Ireland to assist his wife for her
19 medical needs and for his ten year old daughter. As set out in his request for this
20 travel, Mr. Cardiff had also scheduled necessary medical appointments for himself,
21 including a consultation with his cardiologist. Mr. Cardiff had unanticipated health
22 problems. Dr. M.S., Bellbridge Medical Centre referred him for treatment finding
23 him “medically unfit to fly until further notice” pending further testing. Mr. Cardiff
24 underwent medical testing and evaluations as recommended in various records
25 submitted to the Court under seal.¹ The results of testing and evaluation by his
26

27 ¹ As previously stated in his prior request for extension of his travel to Ireland, Mr.
28 Cardiff does not have medical insurance in the United States but does have full

1 consulting cardiologist will be submitted under seal.

2 During the ten-plus months of pretrial release, Mr. Cardiff has consistently
3 complied with all court orders and has previously traveled both domestically and
4 internationally with court approval without incident. His record reflects no
5 violations, demonstrating his commitment to adhering to all conditions of his
6 release. Mr. Cardiff will return to Texas as scheduled and will maintain regular
7 contact with his Pretrial Officer, Ryan McClellan, while traveling. Additionally, Mr.
8 Cardiff will supply Mr. McClellan and Pretrial Services with a full travel itinerary
9 prior to his departure.

10 Sureties Lilia Murphy and Brian Kennedy do not oppose this request.
11 United States Probation Officer Ryan McClellan was contacted on December 12,
12 2024 and, on December 13, 2024, he stated that he was new to Jack Sherrod's case
13 load and believed that he had to obtain guidance from Pretrial Services' Los
14 Angeles Office. Mr McClellan acknowledged that Mr Sherrod had not opposed Mr.
15 Cardiff's international travel on prior occasions and that Mr. Sherrod considered Mr.
16 Cardiff to be cooperative with Pretrial Services.

17 DOJ Valerie Makarewicz and Manu Sebastian were contacted on November
18 12, 2024 and, in response, stated that the Government opposed Defendant's request.

19 WHEREFORE, Defendant requests this Honorable Court extend Mr.
20 Cardiff's international travel for an additional thirty days until January 19, 2025, to
21 allow Defendant to participate by videoconference in hearings set by the Court for
22 January 13, 2025 at 2:00 p.m. and to allow Defendant to participate in any other
23 hearings set by the Court during the period of time extended for Defendants medical
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25 medical insurance coverage in Ireland. It is not feasible to timely obtain insurance
26 in the United States that would cover the expensive testing that needs to be
27 conducted for Mr. Cardiff. The Court allowed Mr. Cardiff to remove his GPS
monitoring bracelet to undergo EGK testing. Dkt. ___.
28

1 testing, evaluation and treatment.

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3 Dated: December 13, 2024

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By: /s/ Stephen R. Cochell
Stephen R. Cochell

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Attorney for Defendant
JASON EDWARD THOMAS CARDIFF

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SERVICE LIST

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/S/ Stephen R. Cochell

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